

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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TIFFANY TOTH, GEMMA LEE, JESSA HINTON,  
BROOKE TAYLOR, JESSE GOLDEN, LINA POSADA,  
SHEENA LEE WEBER, HEATHER RAE YOUNG,  
RACHEL KOREN, SABELLA SHAKE, URSULA  
MAYES and CARMEN ELECTRA,

Plaintiffs,

-against-

**15-cv-08028-NRB**

**REQUEST FOR AN ENTRY OF  
DEFAULT**

59 MURRAY ENTERPRISES, INC. d/b/a NEW YORK  
DOLLS GENTLEMEN'S CLUB, BARRY LIPSITZ,  
AAM HOLDING CORPORATION d/b/a PRIVATE  
EYES GENTLEMEN'S CLUB, ANITA MICELI, JAY-  
JAY CABARET, INC. d/b/a FLASHDANCERS  
GENTLEMEN'S CLUB and MARSHA LIPSITZ,

Defendants.

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59 MURRAY ENTERPRISES, INC., BARRY LIPSITZ,  
AAM HOLDING CORPORATION, ANITA MICELI,  
JAY-JAY CABARET, INC., and MARSHA LIPSITZ,

Third-Party Plaintiffs,

-against-

INTERNET MANAGEMENT CORP. and MELANGE  
MEDIA GROUP LLC,

Third-Party Defendants.

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TO: RUBY J. KRAJICK, CLERK OF COURT  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Pursuant to Federal Rules of Civil Procedure Rule 55(a), Defendants/Third-Party Plaintiffs

59 Murray Enterprises, Inc., Barry Lipsitz, AAM Holding Corporation, Anita Micelli, Jay-Jay  
Cabaret, Inc. and Marsha Lipsitz (collectively, "Third-Party Plaintiffs"), respectfully request an

entry of default against Third-Party Defendants Internet Management Corp. and Melange Media Group LLC for failure to appear or otherwise defend.

This action was commenced on October 13, 2015 by the filing of the Summons (D3) and Complaint (D1). The third-party action was commenced on July 15, 2015 with the filing of the Third-Party Summons (D29) and Third-Party Complaint (D25). On August 4, 2016, a copy of the Third-Party Summons and Complaint were served on Third-Party Defendant Internet Management Corp. by personal service. Third-Party Plaintiffs filed an Affidavit of Service on August 25, 2016 (D31). On August 11, 2016, a copy of the Third-Party Summons and Complaint were served on Third-Party Defendant Melange Media Group LLC by personal service. Third-Party Plaintiffs filed an Affidavit of Service on August 23, 2016 (D30). Third-Party Defendants have not answered the Third-Party Complaint and the time for Third-Party Defendants to do so has expired.

Dated: New York, New York  
September 12, 2016

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

By: /s/ Peter T. Shapiro  
Peter T. Shapiro, Esq.  
*Attorneys for Defendants/Third-Party Plaintiffs 59*  
*Murray Enterprises, Inc., Barry Lipsitz, AAM*  
*Holding Corporation, Anita Micelli, Jay-Jay*  
*Cabaret, Inc. and Marsha Lipsitz*  
77 Water Street, Suite 2100  
New York, New York 10005  
212-232-1300  
Peter.Shapiro@lewisbrisbois.com

**CERTIFICATE OF SERVICE**

I hereby certify that on September 12, 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

/s/ Peter T. Shapiro  
Peter T. Shapiro, Esq.